

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRITTANY WATTS)	
)	
)	
Plaintiff,)	
)	Case No. 4:25-cv-00049
v.)	
)	
BON SECOURS MERCY)	Hon. Judge
HEALTH; ST. JOSEPH WARREN)	
HOSPITAL; CONNIE MOSCHELL;)	JURY TRIAL DEMANDED
JORDAN CARRINO; PARISA)	
KHAVARI; CITY OF WARREN,)	
OHIO; NICHOLAS CARNEY;)	
UNKNOWN OFFICERS, and)	
UNKNOWN MEDICAL)	
PROFESSIONALS,)	
)	
Defendants.)	

AFFIDAVIT OF DR. JOY COOPER

AFFIDAVIT OF DR. JOY COOPER

I, Joy Cooper, being of lawful age and provide the following statements under oath:

1. I have been a practicing obstetrician-gynecologist for 7 years.
2. In 2006, I received my undergraduate degree from Harvard University. I then obtained my medical degree from Howard University College of Medicine in 2013.
3. In 2017, I completed a four-year obstetrics and gynecology residency program at the University of Pennsylvania Health Systems.
4. I am board certified in obstetrics and gynecology by the American Board of Obstetrics and Gynecology. I am licensed in California and New York in medicine and surgery.
5. I am currently practicing as an obstetrician-gynecologist hospitalist at various hospitals throughout the state of California.
6. I am also the chief executive officer of Culture Care, Inc. and Culture Care Medical Group which specializes in mitigating health disparities of Black women through second opinions.
7. At least half of my professional time is dedicated to active clinical practice in obstetrics and gynecology.
8. As a practicing obstetrician-gynecologist, I am familiar with the standard of care that obstetricians and gynecologists must provide to patients, including the applicable standard of care pertaining to the allegations contained in this Complaint. The relevant standard of care does not differ by state or hospital setting.
9. I have reviewed all medical records reasonably available to Ms. Watts concerning the allegations contained in the Complaint, including Ms. Watts' medical records from September 19, 2023, through December 27, 2023.

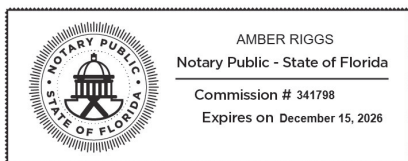
10. Based on my review of Ms. Watts' medical records, it is my opinion that Defendant Dr. Parisa Khavari breached the standard of care when treating Ms. Watts by failing to provide proper medical treatment to Ms. Watts.

11. This breach of the standard of care caused Ms. Watts to be injured as alleged in the Complaint.



01/09/2025

Joy Cooper, MD



State of Florida

County of Palm Beach County

Sworn to (or affirmed) and subscribed before me by means of online notarization, this 01/09/2025 by Joy Alison Cooper.



Amber Riggs

___ Personally Known OR ___~~X~~roduced Identification

Type of Identification Produced DRIVER LICENSE